

Larry B. Feinstein
VORTMAN & FEINSTEIN
 2033 6th Ave, Suite 251
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 (206) 223-9595 and (425) 643-9595
 lbf@chutzpa.com

Tim Eyman

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BILLING DATE: 02/25/22

ACC'T NO.: LBF-EYMAN 2

RE: Ch 11 Post-Confirmation Fees

DATE	PROFESSIONAL SERVICES RENDERED	INDIV	TIME	AMOUNT
04/08/20	File Plan, order, ballot analysis. Emails with client on confirmation requirements and new bank account. Emails with Susan Edison.	LBF	1.10	467.50
04/10/20	Telephone call from client re: plan payments	KPS	1.20	420.00
04/13/20	Telephone call to client re: plan feasibility in post-Covid context.	KPS	0.70	245.00
04/24/20	Telephone call with client regarding house and IRA.	LBF	0.30	127.50
06/05/20	Reconcile billing between 2nd and 3rd fee requests. Apply credit of \$17.35 due to accounting error. Categorize entries. Draft 3rd and Final Fee Request. Emails with LBF re: same. Email to Seth Goodstein, Richard Sanders, and Carolyn Lake re: final fee request timing prior to case closure and requirements for their fee request.	KPS	3.50	1,225.00
06/08/20	Finalize and mail out Motion for Final Decree and Motion for Final Compensation.	KPS	1.00	350.00
06/08/20	Telephone call with client on plan closing, US Trustee fees, and new account disbursements.	LBF	0.40	170.00
06/15/20	Review US Trustee monthly report and create budget comparison	KPS	0.50	175.00
06/29/20	Review and revise S. Edison's draft of order closing estate	LBF	0.40	170.00
07/07/20	Telephone call with R. Sanders on agreed order on contempt capped at May 18th, legal fees, and closing the bankruptcy case.	LBF	0.40	170.00
07/25/20	Telephone calls with client and Pete deNormandie on process and procedure for sale of house	LBF	1.00	425.00
07/27/20	Emails and telephone calls with Richard Sanders and Pete deNormandie on house sale procedure, distribution of sale proceeds, and fees and costs.	LBF	1.00	425.00

PLEASE MAIL ALL PAYMENTS TO OUR SEATTLE OFFICE.

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08/08/20	Draft letter to Sanders on sanctions finalization.	LBF	0.20	85.00
08/10/20	Telephone call with Pete deNormandie re: offer on house.	LBF	0.40	170.00
08/13/20	Review Purchase and Sale Agreement of residence from Karen Eyman.	LBF	0.40	170.00
08/19/20	Emails with client. Telephone call with P. deNormandie on sale of house. Emails with S. Edison on balances due to the State.	LBF	0.50	212.50
08/24/20	Emails with client and R. Sanders on purging contempt and sale of residence	LBF	0.30	127.50
09/24/20	Work on finalizing motion to sell home, including valuation, and draft notice of hearing.	LBF	1.10	467.50
09/29/20	Revise Motion to Sell.	KPS	0.30	105.00
09/29/20	Draft Order Approving Sale of Debtor's Interest in house. Review PSA and Lis Pendens.	KPS	1.10	385.00
09/30/20	Finalizing Motion to sell and order. Emails with client re: same.	LBF	0.80	340.00
10/15/20	Draft response to S. Edison on settlement vis a vis house value. Emails with client, deNormandie, and Pidgeon on State's objection.	LBF	0.80	340.00
10/15/20	Telephone call with client re: house sale and financing from Jari Williams. Emails with S. Edison.	LBF	0.40	170.00
10/16/20	Emails with S. Edison re: sanctions order.	LBF	0.30	127.50
10/21/20	Emails with S. Edison and client on valuation of house and Karen's separate property claims. Emails with deNormandie.	LBF	1.00	425.00
10/30/20	Telephone call with client on sale of home. Telephone call with P. deNormandie on Jari Williams' financing of Karen's offer on home.	LBF	0.40	170.00
11/16/20	Review and file US Trustee monthly report	KPS	0.30	105.00
11/23/20	Draft motion to re-close case.	KPS	0.50	175.00

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11/23/20	Telephone call from client regarding re-closing case, hypothetical scenarios for post-judgment period, and sources of income.	KPS	0.80	280.00
11/24/20	Emails with client on Motion to Close Case. Revise and amend accordingly.	LBF	0.30	127.50
12/01/20	Telephone call from client to review house sale options.	LBF	0.40	170.00
12/04/20	Review State's accounting of sanctions award and payments. Emails with client re: same.	LBF	0.30	127.50
12/11/20	Review and file US Trustee monthly report	KPS	0.30	105.00
01/13/21	Review and file US Trustee monthly report	KPS	0.30	105.00
01/14/21	Email with client re: calculation of the US Trustee fees due on 1/31/21.	KPS	0.10	35.00
02/11/21	Telephone call with client re: Superior Court ruling and plan modification procedures.	LBF	0.50	212.50
02/12/21	Review and file US Trustee monthly report	KPS	0.30	105.00
02/16/21	Emails with and telephone call with client on exemption questions.	LBF	0.30	127.50
02/17/21	Telephone call with client re: renegotiations of plan terms with the State.	LBF	0.40	170.00
03/09/21	Telephone call with client re: state payments, default issues, possible revisions to the plan. Emails with Susan Edison on payments.	LBF	0.40	170.00
03/11/21	Telephone call with client re: Sanders' fees for the appeal, US Trustee MORs requirements, and state payments.	LBF	0.30	127.50
04/01/21	Telephone call with Pete deNormandie and emails with Susan Edison on purchase of the home by Karen Eyman, credits applied, and net offer of \$650,000.	LBF	0.40	170.00
04/13/21	Review and file US Trustee monthly report	KPS	0.30	105.00
05/06/21	Review State's motion for relief. Emails with Sanders, Goodstein, and client re: same.	LBF	0.50	212.50

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05/11/21	Emails with client, R. Sanders, and S. Goodstein on state's motion to file lien and avoid attorneys liens.	LBF	0.40	170.00
05/13/21	Review and file US Trustee monthly report	KPS	0.30	105.00
05/18/21	Research case law regarding RCW 60.40.010 and 11 U.S.C. 503(b) admin expense claims, priorities under Plan, violations of automatic stay, etc.	KPS	1.80	630.00
05/18/21	Draft response to State's Motion for Relief from Stay to Record Judgment and Void Improper Liens.	KPS	2.00	700.00
05/18/21	Review and revise response to State's motion re: liens.	LBF	0.50	212.50
05/20/21	Draft, finalize, and file supplemental response to Sate's motion for relief. Emails with client re: same and BR 2004 exam.	LBF	0.80	340.00
05/21/21	Emails with client on BR 2004 exams. Emails with R. Sanders on new homestead issue. Emails with C. Henry on homestead hypothetical under the new exemption scheme.	LBF	0.40	170.00
05/26/21	Court Appearance: Hearing on State's Motion for relief from stay. Prepare for hearing. Review pleadings. Telephone call with Seth Goodstein re: same.	LBF	1.80	765.00
06/01/21	Emails with client on home transfer and divorce settlement.	LBF	0.20	85.00
06/02/21	Emails with Marc Stern on home purchase offers and state's response.	LBF	0.30	127.50
06/23/21	Email to Tara Mauer regarding new quarterly reporting form.	KPS	0.10	35.00
07/19/21	Work on new quarterly report form, including review of file (claims, past MORs, etc.) and emails to creditors for payment histories. Create spreadsheet to better organize information required for the report. Email to client to confirm numbers.	KPS	2.40	840.00
07/27/21	Attend remote deposition of Carol Williams by State of WA (Susan Edison)	KPS	1.30	455.00

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08/14/21	Multiple emails and phone calls with client on house settlement and plan payments.	LBF	1.00	425.00
09/03/21	Multiple emails with client regarding default hypotheticals and trade in of 2013 Ford Explorer.	KPS	1.00	350.00
09/09/21	Emails with client on Karen Eyman's deposition and bank documents.	LBF	0.20	85.00
09/10/21	Review adversary complaint, answers, and K. Wyman intervenor motion and declaration.	VC	0.50	75.00
09/13/21	Work on summary judgment motion, draft, statement of facts, including download bankruptcy court dockets.	VC	1.20	180.00
09/16/21	Work on summary judgment motion, including legal research regarding whether the State is entitled to relief from the stay for cause.	VC	1.50	225.00
09/20/21	Work on legal argument, including continued legal research re: unsecured creditors' right to relief from stay for lack of adequate protection under 11 USC 361.	VC	2.30	345.00
09/21/21	Download and review State's motion for comfort order and order re: same.	VC	0.40	60.00
09/29/21	Research regarding bankruptcy court decisions interpreting state community property issues.	VC	1.00	150.00
09/30/21	Continue drafting legal argument/motion for summary judgment.	VC	0.80	120.00
10/03/21	Continue legal research regarding whether State is entitled to adequate protection when unsecured.	VC	0.50	75.00
11/01/21	Work on statement of facts in summary judgment motion.	VC	1.00	150.00
11/03/21	Work on motion for summary judgement on State's new complaint on the house.	LBF	0.70	297.50
11/03/21	Work on summary judgment motion. Emails with LBF re: same.	VC	1.00	150.00

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11/04/21	Court Appearance: State's Motion for Relief from Stay. Emails with Susan Edison re: motion for trustee and for production of documents.	LBF	0.50	212.50
11/05/21	Emails with Marc Stern on document requests and interrogatories.	LBF	0.30	127.50
11/08/21	Revise LBF's response to State's Motion to Appoint a Ch 11 Trustee and other Relief.	KPS	1.50	525.00
11/08/21	Research and draft response to State's Motion to Appoint Ch 11 Trustee.	LBF	2.30	977.50
11/09/21	Emails with client about and revisions to response to State's Motion to appoint Ch 11 trustee.	LBF	1.80	765.00
11/10/21	Emails with client about and additional revisions to Response and Declaration to State's Motion to appoint Chapter 11 trustee. Finalize and file same.	LBF	0.90	382.50
11/15/21	Prepare for hearing on State's Motion to appoint Chapter 11 trustee.	LBF	1.00	425.00
11/18/21	Court Appearance: Hearing on State's Motion to appoint Chapter 11 trustee	LBF	2.00	850.00
11/29/21	Emails with Goodstein and Klinedinst on objection to State's Motion.	LBF	0.50	212.50
12/06/21	Work on quarterly MOR spreadsheets and review bank statements from client.	KPS	1.00	350.00
12/07/21	Continue working on Q3 MOR.	KPS	1.00	350.00
12/07/21	Draft response to State's Motion to Convert to Chapter 7.	LBF	1.10	467.50

Total of New Services:	65.50	23,262.50
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DATE	EXPENSE	AMOUNT
04/08/20	Snohomish County Recorder's Fee - \$116.50	116.50
06/08/20	Postage	7.15
10/01/20	Postage	1.95
11/24/20	Postage	4.00

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Total of New Expenses:		129.60
DATE	PAYMENT	AMOUNT
05/23/20	Payment received - \$1,376.500	1,376.50
06/10/20	Payment received - \$2,000.00	2,000.00
08/28/20	Payment received - \$1,117.15	1,117.15
02/03/21	Payment received - \$3,000.00	3,000.00
08/19/21	Payment received - \$7,500.00	7,500.00
08/19/21	Account credit per LBF	490.95
12/06/21	Payment received - \$845.00	845.00
Total of New Payments:		16,329.60

ACCOUNT SUMMARY

PREVIOUS BALANCE:	\$0.00
NEW SERVICES:	\$23,262.50
NEW EXPENSES:	\$129.60
NEW PAYMENTS:	\$16,329.60
TOT. CURRENT PERIOD:	\$23,392.10
CURRENT BALANCE:	\$7,062.50

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